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March 16, 2012

VIA ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Comments for Auction 901, AU Docket No. 12-25
Notice of Limited Extension of Deadlines For Census Block Eligibility Challenges

Dear Ms. Dortch:

Attached to this correspondence are Comments for Auction 901, AU Docket No. 12-25 regarding the Notice of Limited Extension of Deadlines for Census Block Eligibility Challenges. This is being respectfully submitted by the Commonwealth of Kentucky, Office of Broadband Outreach and Development.

Sincerely,

A handwritten signature in blue ink that reads "Melany K. Crawford".

Melany K. Crawford
Deputy General Counsel

Enclosure

cc: Brian Kiser

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	AU Docket No. 12-25
Mobility Fund Phase I Auction 901)	
Notice of Limited Extension of Deadlines)	
For Census Block Eligibility Challenges)	

COMMENTS OF OBOD

The Commonwealth Office of Broadband Outreach and Development (“OBOD”) submits the following comments on behalf of the Commonwealth of Kentucky.

I. Introduction

OBOD appreciates the Commission granting an extension of time for comments and reply comments on census block eligibility challenges in the Mobility Fund Phase I Auction.¹ In its prior comments, OBOD committed that if such an extension were granted it would look forward to comparing the proposed American Roamer data for the Commonwealth of Kentucky with data OBOD has compiled from its sources to find an optimal approach for determining census block eligibility for the Mobility Fund Phase I support.² OBOD is pleased to have this extended comment cycle to share its analysis with the Commission.

¹ “Mobility Fund Phase I Auction Limited Extension of Deadlines for Comments And Reply Comments on Census Block Eligibility Challenges,” *Public Notice*, AU Docket No. 12-25, DA 12-236, rel. Feb. 16, 2012

² *Comments of Commonwealth Office of Broadband Outreach and Development for the Commonwealth of Kentucky*, 2 (Feb. 24, 2012), AU Docket No. 12-25, DA 12-121 (rel. Feb. 2, 2012)

II. Discussion

OBOD has been developing and refining maps of broadband coverage – both wireless and wireline - in the Commonwealth of Kentucky since February 2010. OBOD provides updated broadband coverage data to The National Telecommunications and Information Administration (“NTIA”) twice a year as part of its State Broadband Initiative (“SBI”) to update the National Broadband Map, a public searchable map of broadband coverage available since February 2011.³ OBOD will provide to NTIA its next update of wireless and wireline broadband coverage data for the Commonwealth of Kentucky on April 1, 2012, based on SBI data collection current as of December 31, 2011.

OBOD has expedited its analysis of its recent wireless data collection for these comments, in order to compare its new SBI data (for the Commonwealth of Kentucky) that will be used to populate the National Broadband Map with the Commission’s updated list of census blocks in Kentucky potentially eligible for Mobility Fund Phase I support, based on January 2012 American Roamer data.⁴ In its comparison, OBOD found significant differences between its new data set and the Commission’s American Roamer-based data set.

In particular, OBOD found 2207 census blocks not served by wireless broadband according to its most recent SBI data collection, which the Commission does not show as potentially eligible census blocks by virtue of being unserved. These 2207 unserved census blocks in the Commonwealth’s SBI data include a population of 34,250. When this population in

³ NTIA, *BROADBANDUSA, Connecting America’s Communities*, Retrieved March 13, 2012 from <http://www2.ntia.doc.gov/SBDD>

⁴ “Mobility Fund Phase I Auction Updated List of Potentially Eligible Census Blocks,” *Public Notice*, AU Docket No. 12-25, DA 12-187, rel. Feb. 10, 2012 (*Updated Potentially Eligible Census Blocks Public Notice*), Attachment A and Attachment A files.

OBOD's additional unserved census blocks is added to the 239,176 population the Commission shows as living in potentially eligible unserved census blocks⁵, the net is 273,426

Commonwealth of Kentucky residents living in census blocks not served by wireless broadband, far more than has been reported in any other state, and by orders of magnitude more than in most other states.⁶

As directed by the Commission in its *Auction 901 Comment Public Notice*,⁷ OBOD has attached to these comments a list of census blocks that OBOD shows as *not* covered by wireless broadband service in the Commonwealth of Kentucky, but which do not appear in the Commission's list of potentially eligible census blocks.⁸ This attached list was created using the same methodology used by the Commission, but with SBI data rather than American Roamer data. The list includes all the same categories of information for the additional unserved census blocks as the Commission included in its list of potentially eligible census blocks provided in Attachment A files to the Notice.⁹ These 2207 additional unserved census blocks are highlighted on the attached map showing the Commission's potentially eligible census blocks based on its January 2012 American Roamer data, overlaid with the Commonwealth's additional unserved census blocks based on its December 31, 2011 SBI data. The additional 2207 unserved census blocks appear in blue overlaying the blocks included from the Commission's map.

⁵ Id., Attachment A

⁶ Id.

⁷ "Mobility Fund Phase I Auction Scheduled for September 27, 2012; Comment Sought on Competitive Bidding Procedures for Auction 901 and Certain Program Requirements," *Public Notice*, AU Docket No. 12-25, DA 12-121, para. 19, 7, rel. Feb. 2, 2012 (*Auction 901 Comment Public Notice*)

⁸ *Updated Potentially Eligible Census Blocks Public Notice*, AU Docket No. 12-25, DA 12-187, rel. Feb. 10, 2012, Attachment A

⁹ Id., Attachment A files

So as to ensure that unserved census blocks in the Commonwealth of Kentucky have the opportunity to be considered for the Commission's Mobility Fund Phase I support, OBOD believes an optimal approach for determining census block eligibility for the Mobility Fund Phase I support would be to add these 2207 unserved census blocks to the Commission's updated list of potentially eligible census blocks.

III. Conclusion

OBOD expedited its analysis of its December 31, 2011 SBI data collection in order to compare it with the Commission's American Roamer-based data, in an attempt to provide the Commission with a more accurate list of census blocks not covered by wireless broadband service in the Commonwealth of Kentucky. In its analysis, OBOD found 2207 census blocks in the Commonwealth of Kentucky that are not included in the Commission's updated list of census blocks potentially eligible for Phase I Mobility Fund support. 34,250 Commonwealth residents live in those unserved census blocks.

Accordingly, OBOD respectfully requests that the Commission add these additional 2207 census blocks to its updated list of census blocks potentially eligible for Phase I Mobility Fund support. Including these 2207 census blocks that are currently unserved by wireless broadband as blocks potentially eligible to receive Phase I Mobility Fund support would provide an increased opportunity to extend the reach and benefits of mobile voice and broadband service to more Commonwealth citizens who still do not have access to this essential communications vehicle.